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Michael S. Slomin

Senior Attorney

LCC-2B336 290 West Mt. Pleasant Avenue Livingston, New Jersey 07039-2798 201-740-6390 Fax 201-740-6846

August 16, 1993

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N. W., Room 222 Washington, D. C. 20554

Re: CC Docket No. 92-237 GEN Docket No. 90-314

RECEIVED

AUG 1 7 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Caton.

Attached please find copies of a letter of this date from George Heilmeier, President, to the Chairman, Common Carrier Bureau. The subject of this letter could be viewed as related to the subject of proceedings in CC Docket No. 92-237 (the Commission's inquiry on administration of the North American Numbering Plan) and GEN Docket No. 90-314 (addressing personal communications services). Accordingly, I would ask that copies of this correspondence be associated with the docket files of those proceedings, and that you stamp and return one copy of this correspondence to me for my files.

Thank you for your attention to this matter.

M. S. Slomin /sac

Sincerely,

M. S. Slomin

Attachment



George H. Helimeler
President and Chief Executive C

290 West Mt. Pleasant Avenue Livingston. New Jersey 07039-2798 201-740-3131

August 16, 1993

James H. Quello, Chairman Federal Communications Commission Room 802 Stop Code 0106 1919 M Street Washington, DC 20054 RECEIVED

AUG 1 7 1993

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Dear Chairman Quello:

As a result of the many changes in the telecommunications environment that have resulted in increased controversy regarding numbering, Bellcore and its owners believe that it is time to relinquish Bellcore's voluntary administration of the North American Numbering Plan (NANP), and to establish a plan for transferring this activity elsewhere.

As the Commission knows, Bellcore has been the North American Numbering Plan Administrator (NANPA) on behalf of the entire industry in World Zone 1 since divestiture, when that function was transferred to Bellcore from AT&T with the approval of the MFJ Court. Bellcore has administered NANP-wide numbering resources such as Numbering Plan Area (NPA) codes, Service Access Codes (SACs), Carrier Identification Codes (CICs), and administration of the 809 NPA code. Bellcore, as NANPA, has been a responsible and impartial caretaker of the numbering resources it has administered, and has promoted the public interest by seeking to maximize efficiency and minimize costs sustained by all, users and service providers alike.

Nevertheless, some have claimed -- without basis -- that Bellcore might discriminate in favor of its owners or the exchange carrier segment of the industry. While the record is clear that Bellcore has not done so, the combination of changes in the industry environment and increases in the intensity and number of these attacks has convinced Bellcore and its owners that it would be wise to establish a plan for transferring the NANPA function. We emphasize and know that you agree that numbering decisions are important to this industry and to the public; that they affect service providers and the end users in the United States. in 17 other World Zone 1 nations and internationally; and that they must continue to be made in a fair, impartial, timely and competent fashion. We think it is essential that Bellcore's successor as NANPA must continue to serve these objectives. We believe that this should continue to be done subject to government oversight, but in a manner that does not become bogged down in unnecessarily time-consuming processes.

Therefore, Bellcore hereby advises the FCC (and other appropriate bodies in World Zone by copy of this letter) that an industry process should immediately be initiated to transfer the NANPA function from Bellcore to one or more alternative entities. A transition will be needed, and it must be orderly, satisfy the needs of the industry, be handled in a

responsible and competent manner, and be accomplished in a reasonable time period. We believe that this transition can be completed within a 12 to 18 month time frame, and intend to work toward that result.

Furthermore, the industry should have the opportunity informally to address what entity(ies) should perform the NANPA function, with what funding, and under what procedures and oversight. We ask that the Commission encourage this industry process to commence promptly, and for its staff to participate actively. We similarly encourage the informal participation of parties from other World Zone 1 nations in public forums.

After this industry action, there will be time for the Commission to initiate and conduct whatever formal proceedings it deems appropriate to accomplish the transfer. In the event that the industry is not able to reach consensus on administration and procedures, as well as organization and operation of an oversight body within the period mentioned above, Bellcore would be willing, at the direction of the Commission, to continue to provide the administration function beyond the contemplated transition period.

Sincerely,

George H. Heilmeier President and CEO

Copy to:

Other World Zone 1 Entities

Anguilla
Commonwealth of the Bahamas
Bermuda
Cayman Islands
Dominican Republic
Jamaica
Saint Kitts and Nevis
Saint Vincent and the Grenadines
Trinidad and Tobago

Antigua and Barbuda
Barbados
British Virgin Islands
Canada
Grenada
Montserrat
Saint Lucia
Turks and Caicos

NANPA Distribution List